

### REMARKS

Initially, Applicant wishes to thank the Examiner for conducting a telephonic interview with two of Applicant's representatives on April 1, 2010. During that interview, the representatives and the Examiner reviewed the present invention as recited in Claim 12. They discussed the references cited in the last Office Action for the rejection of Claim 12 and the permissibility of combining these references. They also discussed certain features that might distinguish the claimed invention from the cited references and identified corresponding claim amendment.

Based on the discussion and Applicant's arguments, Claims 12-17, 19-21, 23-26 and 29 have been amended to define still more clearly what Applicant regards as his invention. Favorable reconsideration is respectfully requested.

Applicant submits that the independent claims, together with their dependent claims, are patentable over the cited prior art for at least the following reasons.

The nature of the present invention and that of the cited references have been adequately discussed in previous amendments, and it is not believed necessary to repeat that discussion in full.

Applicant notes that network devices may communicate with one another using a network-compatible Plug and Play protocol, such as UPnP, which provides technology for interconnecting *devices* (para. [0010]). Now, a network device, such as a printer or an associated information apparatus, may have multiple printer drivers available respectively corresponding to multiple rendering languages (para. [0003]). If the network device does not support Plug and Play, a client which only supports Plug and Play will not be able to access these printer drivers.

However, even if the network device supports Plug and Play, the client still might not obtain information regarding all the printer drivers or even regarding a particular one of those printer drivers (para. [0017]). This is because Plug and Play communication normally involves information at the *device* level. For example, the client's request specifies a printer name rather than information about the printer drivers for the printer, and the network device's response indicates basic attributes of the printer, such as an associated printer driver being the first one detected.

According to certain aspects of the present invention, a management apparatus initiates a first request to determine which network devices support Plug and Play (para. [0067]). It then initiates a second request for printer driver information (para. [0075]), and receives, from a specific network device that has one or more printer drivers available but does not support Plug and Play, information regarding all those printer drivers (para. [0076] and [0082]). It then stores such information into a management table (para. [0083]).

Subsequently, the management apparatus takes requests from a client for a printer that supports Plug and Play and has one of those printer drivers (para. [0090]). It searches the management table for the particular printer driver and finds the network device which does not support Plug and Play but has that particular printer driver available. It then responds to the client with information that represents the network device as one that supports Plug and Play and is associated with that particular printer driver (paras. [0091] and [0092]). In this way, the management apparatus represents the network device as multiple network devices supporting Plug and Play respectively corresponding to its printer drivers.<sup>1</sup>

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1. It is to be understood that the scope of the claims is not limited by the details of this or any other embodiment that may be referred to.

Claim 12 recites, among other features, “generating means for... generating a plurality of device IDs corresponding to the plurality of print data generating functions, where each device ID includes at least information identifying the model, information indicating the manufacturer and information indicating one of the plurality of print data generating functions... ; and response means for responding to the client apparatus using the plurality of device IDs generated by said generating means.”

These features are not believed to be disclosed or suggested in U.S Patent Application Publication 2002/0156947 (Nishio) and U.S. Patent 6,216,916 (Elwell et al.), considered separately or in any permissible combination.

The Advisory Action states that each device that has a device driver is associated with a device ID in *Nishio*, in paragraph 62.<sup>2</sup> While *Nishio* involves representing a network device which does not support Plug and Play as one that has one that supports Plug and Play, it does not address the possibility that such a network device has multiple printer drivers available.

As explained above, it is not at all straightforward to extend the scenario concerning one printer driver to one involving multiple printer drivers. Plug and Play communication is generally performed on a device basis. Therefore, even if a management device takes a Plug and Play request from a client of the printer and is aware that the printer has multiple printer drivers available, it does not need to compose its UPnP response any differently from including the representation of the printer associated with one of the printer drivers, such as the first one detected.

*Elwell* is not believed to remedy this deficiency. First of all, it discusses multiple image processing functions, such as copying and faxing, rather than multiple print data

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2. Applicant submits that paragraph 62 concerns communicating with a network device which supports Plug and Play, which is not germane to the issue of representing a network device which does not support Plug and Play.

generating functions. Even assuming that *Elwell* discussed multiple device drivers on a host computer that could be considered as multiple printer drivers for a multifunctional apparatus, it concerns facilitating communication between the host computer and the multifunctional apparatus rather than the communication between a client of the multifunctional apparatus and the host computer or ultimately the multifunctional apparatus (*see* Abstract). Even assuming that *Elwell* dealt with the communication between a client of the multifunctional apparatus and the host computer, it does not discuss representing the multifunctional apparatus to the client as multiple apparatuses supporting Plug and Play.

The Advisory Action states that *Elwell* is used to show that a multifunctional apparatus can be treated as multiple, separate apparatuses based on each function. Applicant does not see how *Elwell* disclosed “treating a multifunctional apparatus as multiple apparatuses.”

Claim 12 clearly recites “generating a plurality of device IDs... , where each device ID includes at least information identifying the model [of a device], information indicating the manufacturer [of the device] and information indicating one of the plurality of print data generating functions [for the device]... and ... responding to the client apparatus using the plurality of device IDs.” However, *Elwell* involves nothing more than multiple device drivers' *independent communications with a multifunctional apparatus* respectively regarding its different functions, which does not at all translate into “treating a multifunctional apparatus as multiple apparatuses.” As far as the device drivers are concerned, there is still *one single apparatus as the communication target*. Even if the different functions might be individually referenced, the multifunctional apparatus is not separately referred to as multiple apparatuses in any way.

Accordingly, for at least the reasons stated above, Claim 12 is believed patentable over *Nishio* and *Elwell*, considered separately or in any permissible combination.

Claims 20 and 21 recite features similar to those discussed above with respect to Claim 1 and, therefore, are also believed to be patentable over *Nishio* and *Elwell* for the reasons discussed above.

A review of the other art of record has failed to reveal anything which, in Applicant's opinion, would remedy the deficiencies of the art discussed above, as references against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and allowance of the present application.

Applicant's undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectively submitted,

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